

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

Defendant Jeffery Family Trust hereby answers Local Rule 26.01 Interrogatories as follows:

A. State the full name, address and telephone number of all persons who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER:

None.

B. As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER:

Plaintiff has demanded a jury trial on all legal claims.

C. State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent, partner, or affiliate; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER:

None.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER:

Plaintiff alleges damages occurred in this division. Moreover, complete diversity exists between the parties and the Plaintiff has admitted that the claimed damages exceeds \$75,000.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

This action is related to Gary Lynn Schneider v. Jeffrey Family Trust, 2022-CP-07-2240, which is being removed simultaneously with this action. These actions arise out of the same incident.

F. [**Defendants Only.**] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER:

None.

G. **[Defendants Only.]** If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER:

None at this time.

H. ***Parties or Intervenors in a Diversity Case.*** In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

ANSWER:

In Plaintiff's Complaint, she states that she is a resident of the state of Maryland. Further, in its Answer to the Complaint, Defendant is a trust created in the State of Massachusetts.

Respectfully submitted,

s/ James B. Robey, III

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